**Approval Package for: 074832** 

Trade Name: CAPTOPRIL AND HYDROCHLORTHIAZIDE TABLETS USP, 50MG/25MG

Generic Name: Captopril and Hydrochlorthiazide Tablets USP, 50mg/25mg

Sponsor: Danbury Pharmacal, Inc.

Approval Date: December 29, 1997

### **APPLICATION 074832**

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	Included	Pending	Not	Not
		Completion	Prepared	Required
Approval Letter	X			<del></del>
<b>Tenative Approval Letter</b>				
Approvable Letter			· · · · · · · · · · · · · · · · · · ·	
Final Printed Labeling	X			<u> </u>
Medical Review(s)		· · · · · · · · · · · · · · · · · · ·	···	
Chemistry Review(s)	X			<del>/= //</del>
EA/FONSI		- · · · ·		
Pharmacology Review(s)				
Statistical Review(s)				
Microbiology Review(s)				
Clinical Pharmacology				·
<b>Biopharmaceutics Review(s)</b>				
Bioequivalence Review(s)	X		·	·
Administrative Document(s)				
Correspondence	"		····	***

**Application Number 074832** 

## **APPROVAL LETTERS**

Danbury Pharmacal, Inc. Attention: William R. McIntyre, Ph.D. 131 West Street Danbury, CT 06810

### Dear Sir:

This is in reference to your abbreviated new drug application dated December 29, 1995, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act, for Captopril and Hydrochlorothiazide Tablets USP, 50 mg/25 mg.

Reference is also made to your amendment dated December 3, 1997.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the application is approved. The Division of Bioequivalence has determined that your Captopril and Hydrochlorothiazide Tablets USP, 50 mg/25 mg, are bioequivalent and, therefore, therapeutically equivalent to the listed drug (Capozide® Tablets, 50 mg/25 mg, of E.R. Squibb and Sons, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

Under 21 CFR 314.70, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the proposed or final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-240). Please do not use Form FD-2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-240) with a completed Form FD-2253 at the time of their initial use.

Sincerely yours,

12/29/97

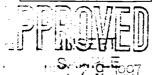
Douglas L. Sporn Director Office of Generic Drugs Center for Drug Evaluation and Research

## **APPLICATION NUMBER 074832**

## **FINAL PRINTED LABELING**



# CAPTOPRIL and HYDROCHLOROTHIAZIDE Tablets, USP Revised: September 1997A



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CAPTOPRIL and HYDROCHLOROTHIAZIDE Tablets, USP

50 mg-25 mg

Dispense in a fight container with a child-resistant closur QQ.NOT BTOME ABOVE 86°F. Keep bottles lightly clas

Dosage: See package insert for dosage and full prescribing information.

Captopril, USP, 50 mg Hydrochlorothiazide, USP, 25 mg

364-2640-0

:381

NDC 0364-2640-05

500 Tablets

**CAPTOPRIL** and HYDROCHLOROTHIAZIDE ĩablets, USP

50 mg-25 mg

NOT STORE ABOVE 35 F. Keep

0364-2640-05 Zπ

Control Number and Expiration Date

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fid. by: Darbury Pharmacal, Inc. Subsipliary of

NDC 0364-2640-02

CAPTOPRIL and HYDROCHLOROTHIAZIDE Tablets, USP

50 mg-25 mg

Caution: Federal law prohibits dispensing without prescription

1000 Tablets

Dispense in a tight container with a child-resistant closure. DO NOT STORE ABOVE 86°F. Keep bottles tightly closed. Dosage: See package insert for dosage and full prescribing information. Captopril, USP, 50 mg Hydrochlorothiazide, USP, 25 mg Protect from moisture.

y: Danbury Pharmacal, Inc. Subsidiary of Schein Pharmaceutical, Inc. Florham Park, NJ 07932 USA Mfd. by: [

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Control Number and Expiration Date

## **APPLICATION NUMBER 074832**

**CHEMISTRY REVIEW(S)** 

- 1. CHEMISTRY REVIEW NO. 3 2. ANDA # 74-832
- 3. NAME AND ADDRESS OF APPLICANT
  Danbury Pharmacal, Inc.
  Attention: William R. McIntyre, Ph.D.
  131 West Street
  Danbury, CT 06810
- 4. <u>BASIS OF SUBMISSION</u> Capozide\* of Squibb; Paragraph III cert. Pat. #4,217,347 expiring on December 27, 1997.
- 5. <u>SUPPLEMENT(s)</u> N/A 6. <u>PROPRIETARY NAME</u> none
- 7. NONPROPRIETARY NAME Captopril and Hydrochlorothiazide USP.
- 8. SUPPLEMENT(s) PROVIDE(s) FOR: N/A
- 9. AMENDMENTS AND OTHER DATES:
  December 29, 1995 Date of application.
  December 3, 1997 Amendment
- 10. PHARMACOLOGICAL CATEGORY ACE inhibitor and diuretic.
- 11. Rx or OTC Rx 12. RELATED IND/NDA/DMF(s)
- 13. DOSAGE FORM 500 14. POTENCY 50mg/25mg
- 15. CHEMICAL NAME AND STRUCTURE

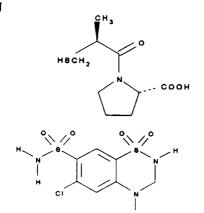
  Captopril USP C<sub>9</sub>H<sub>15</sub>NO<sub>3</sub>S; M.W. = 217.28

  1-[(2S)-3-Mercapto-2-methylpropionyl]-L
  proline. CAS [62571-86-2]

Hydrochlorothiazide USP  $C_7H_8ClN_3O_4S_2$ ; M.W. = 297.73; 6-Chloro-3,4-dihydro-2H-1,2,4-benzothiadiazine-7-sulfonamide-1,1-dioxide. CAS [58-93-5]

- 16. RECORDS AND REPORTS N/A
- 17. <u>COMMENTS</u>: Firm submitted a minor amendment dated 12/3/97 stating that there are no changes in the conditions under which the product was tentatively approved on 10/10/97 including labeling and CMC.
- 18. <u>CONCLUSIONS AND RECOMMENDATIONS</u>
  Approval
- 19. <u>REVIEWER:</u> Jim Fan <u>DATE COMPLETED:</u> 12/11/97
- CC: ANDA 74-832
  DUP File
  Division File
  Field Copy
  Endorsements:

HFD-623/J.Fan' (2/m/g 7 HFD-623/V.Sayeed, Ph.D. x:\new\firmsam\danbury\ltrsarev\74832na3.cr F/T by:



## **APPLICATION NUMBER 074832**

**BIOEQUIVALENCE REVIEW(S)** 

NOV 25 1996

Danbury Pharmacal, Inc. Attention: James O. Kelly 131 West Street Danbury, CT 06810

### Dear Sir:

Reference is made to your abbreviated new drug application submitted pursuant to Section 505 (j) of the Federal Food, Drug and Cosmetic Act for Captopril and Hydrochlorothiazide Tablets, 25 mg and 50 mg, and to our letter dated June 10, 1996.

Reference is also made to your amendments dated August 16, October 2 and November 5, 1996.

Our June 6 letter notified Danbury that for the hydrochlorothiazide component of the product, an interim dissolution specification of of the labeled amount of the ingredient in sinutes was acceptable. It has subsequently been determined that this dissolution specification was not sufficiently discriminatory to confirm the quality of the product. Following discussions with you and the above referenced amendments, the following revised dissolution testing will need to be incorporated into your stability and quality control programs:

The dissolution testing should be conducted in 900 mL of 0.1N HCl at 37°C using USP 23 Apparatus I (basket) at 50 rpm. The test product should meet the following specifications:

Not less than of the labeled amount of captopril in the dosage form is dissolved in 20 minutes and not less than of the labeled amount of hydrochlorothiazide in the dosage form is dissolved in 30 minutes.

These dissolution specifications should be regarded as interim specifications until FDA and USP finalize new dissolution specifications for Captopril and Hydrochlorothiazide Tablets.

Please note that the bioequivalency comments expressed in this letter are preliminary. The above bioequivalency comments may be revised after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling or other scientific or regulatory issues. A revised determination may require additional information and/or studies, or may conclude that the proposed formulation is not approvable.

Sincerely yours,

Rabindra Patnaik, Ph.D.
Acting Director
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

Captopril and

Hydrochlorothiazide Tablets

Danbury Pharmacal

50 mg/25 mg Tablets

Danbury, CT

ANDA #74-832

Reviewer: Moo Park

Filename: 74832A.896

Submission Date:

December 29, 1995 August 16, 1996 October 2, 1996 November 5, 1996

### Review of Three Amendments

### I. Objectives

To review Danbury's two amendments submitted via FAX regarding its dissolution specifications for hydrochlorothiazide. It was found that the contents of the three amendments are exactly same. The amendment contains dissolution data for lot #11919C up to 24 months in four different packages. The same data were sent to USP as of September 18, 1996 for reconsideration of USP proposal.

### II. Background

Danbury's in vivo bioequivalence study demonstrated that Danbury's Captopril and Hydrochlorothiazide Tablets, 50 mg/25 mg, is bioequivalent to Bristol-Myers Squibb's Capozide Tablets, 50 mg/25 mg. However, Danbury's dissolution data for hydrochlorothiazide component in the Captopril and Hydrochlorothiazide Tablets, 50 mg/25 mg strength, concerned the Division of Bioequivalence since Danbury proposed its own specifications and there are at least three additional sets of specifications as summarized below:

Danbury's proposed specifications:

Medium: 0.1N Hcl; 900 mL

Apparatus: Basket(I); 50 rpm

Tolerances: captopril: NLT in 20 min

HCT: NLT in 60 min

Current FDA's specifications: This will be discarded in favor of the current NDA specifications.

Medium: 0.1N Hcl; 900 mL

Apparatus: Basket(I); 100 rpm

Tolerances: captopril: NLT in 30 min

HCT: NLT .n 60 min

Current NDA specifications: Medium: 0.1N Hcl; 900 mL

Apparatus: Basket(I); 50 rpm

Tolerances: captopril: NLT in 20 min

HCT: NLT in 30 min

Pharmacopeial Forum specifications (revised):

Medium: 0.1N Hcl; 900 mL

Apparatus: Basket(I); 50 rpm

Tolerances: captopril: NLT in 20 min

HCT: NLT in 30 min

The Division of Bioequivalence suggested Danbury to tighten its dissolution specifications for hydrochlorothiazide. Danbury responded to the Division with the amendment.

### III. Comments

1. The stability data submitted by Danbury for lot #11919C up to 24 months in four different packages show similar pattern among the different package sizes. The following summary was obtained by analyzing the 100 tablets package size:

Dissolution data obtained at: 30 min

Total number of testing in 24 months: 11 testings

Number of means which are 5

Minimum mean dissolution: with 10.1% CV
Maximum mean dissolution: with 7.7% CV
Average of the means: with 7.2% mean CV

- 2. Danbury commented that their dissolution data for hydrochlorothiazide meet the NDA specifications of NLT in 30 min, not the revised pharmacopeial forum specifications of NLT in 30 min.
- 3. Moo Park developed a method of estimating Q value for dissolution specifications. The method involves the use of mean dissolution from 6-12 units (12 units are preferable.) with their %CV. Lower confidence limits of 95% or 99% confidence intervals (99% confidence intervals are preferable.) are plotted against mean dissolution with a particular %CV. The Q value is the lower 99% confidence limit where the mean dissolution meets with the confidence line constructed under a particular %CV. Figures 1-3 represents the confidence lines prepared at three different %CV levels, 5%, 10% and 15%.

Danbury's data in the comment #1 indicates that Fig 2 with %CV of 10 can be used to estimate the appropriate Q value.

With the dissolution mean of , we obtain the lower 99% confidence limit of The Q values are conventionally a multiple of 5. Therefore, it appears that Q value for Danbury's hydrochlorothiazide should be in 30 min.

- 4. The Division of Bioequivalence agrees with Danbury's estimation of specifications for hydrochlorothiazide.
- 5. Danbury's dissolution data for hydrochlorothiazide are variable. The firm did not provide convincing explanation for possible cause of the variability.
- 6. Danbury accepts the NDA specifications and discards the original proposal of in 60 min for hydrochlorothiazide.

### IV. Recommendations

- 1. The *in vivo* bioequivalence study conducted under fasting conditions by Danbury on its Captopril and Hydrochlorothiazide Tablets, 50 mg/25 mg, lot #11919C, comparing it to Bristol-Myers Squibb's Capozide<sup>R</sup> Tablets, 50 mg/25 mg, Lot #2L51505, has been found acceptable by the Division of Bioequivalence. The study demonstrates that Danbury's Captopril and Hydrochlorothiazide Tablets, 50 mg/25 mg, is bioequivalent to Bristol-Myers Squibb's Capozide<sup>R</sup> Tablets, 50 mg/25 mg.
- 2. The USP dissolution testing conducted by Danbury on its Captopril and Hydrochlorothiazide Tablets, 50 mg/25 mg, lot #11919C, is acceptable.
- 3. The dissolution testing should be incorporated into the firm's manufacturing controls and stability program. The dissolution testing should be conducted in 900 mL of 0.1N HCl at 37°C using USP 23 Apparatus I (basket) at 50 rpm. The test product should meet the following specifications:

Not less than of the labeled amount of captopril in the dosage form is dissolved in 20 minutes and not less than sof the labeled amount of hydrochlorothiazide\* in the dosage form is dissolved in 30 minutes.

\*Dissolution specifications for hydrochlorothiazide are interim.

4. From the bioequivalence point of view the firm has met the in vivo bioequivalence and in vitro dissolution testing and the application is acceptable.

The firm should be informed of the recommendations.

Moo Park, Ph.D. Review Branch III The Division of Bioequivalence

	ALED RMHATRE ALED RMHATRE	 	11/15/96
Concur:	Rabindra Patnaik, Acting Director Division of Bioequ	Date:	1 18 96

cc: ANDA # 74-832 (original, duplicate), Park, Drug File, Division File

DIVISION FILE

File history: Draft (10/11/96); Final (11/15/96)